

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BRUCE RUSH, as a participant in and on behalf of the Segerdahl Corporation employee stock ownership plan, and on behalf of a class of all others who are similarly situated,

Plaintiff,

v.

GREATBANC TRUST COMPANY;  
MARY LEE SCHNEIDER; RICHARD  
JOUTRAS; RODNEY GOLDSTEIN;  
PETER MASON; ROBERT CRONIN;  
JOHN DOE DEFENDANTS 1-10; and  
SEGERDAHL CORP. (d/b/a SG360),

Defendants.

Case No.: 1:19-cv-00738

Judge Andrea R. Wood  
Magistrate Judge Susan E. Cox

**JOINT MOTION FOR EXTENSION OF TIME TO ANSWER  
OR OTHERWISE PLEAD & OTHER RELIEF**

The Parties, by and through their respective undersigned counsel, move this court for an extension of time to and including May 24, 2019 to answer or otherwise plead and to reset the parties' initial status hearing to a date thereafter convenient for the Court. In support of this unopposed motion, the Parties state:

1. On February 5, 2019, Plaintiff filed a complaint on behalf of himself and others similarly situated seeking redress against Defendants for claims arising under the Employee Retirement Income Security Act. (Doc. 1.)
2. On March 7, 2019, Defendants GreatBanc Trust Company, Peter Mason, and Segerdahl Corp. d/b/a SG360° ("Served Defendants") moved the Court for an extension of their responsive pleading deadlines to and including April 19, 2019. ("First Motion"). (Doc. 10.)

3. The Court granted Defendants' motion, setting the case for an initial status hearing on May 2, 2019. (*Id.*; Doc. 12.)

4. Defendant Rodney Goldstein was served on March 19, 2019. Defendant Goldstein and the remaining unserved Defendants, Mary Lee Schneider, Richard Joutras, and Robert Cronin (together, the "Remaining Defendants") recently agreed to pursue a joint defense with the Served Defendants.

5. On March 25, 2019, Defendants' counsel contacted Plaintiff's counsel, James Bloom, advising him of this additional representation and stipulating that Remaining Defendants will agree to waive formal service of process and file their respective responsive pleadings on May 24, 2019 provided that Served Defendants' deadlines to answer or otherwise plead are likewise extended to the same date.

6. This extension will serve to establish the same responsive pleading deadline for all Defendants so that they may file a joint response, as appropriate.

7. Plaintiff's counsel agrees with Defendants' requests.

8. This motion is not brought for purposes of delay, will not prejudice the parties, and promotes judicial economy.

WHEREFORE, the Parties respectfully request that the Court enter an order:

a. Setting the deadline for Mary Lee Schneider, Richard Joutras, Rodney Goldstein, and Robert Cronin to file their respective responsive pleadings as May 24, 2019;

b. Extending the deadline for GreatBanc Trust Company, Peter Mason, and Segerdahl Corp. d/b/a SG360° to file their respective responsive pleadings to and including May 24, 2019; and

c. Resetting the Parties' May 2, 2019 status date to a later date convenient for the Court.

Dated: March 29, 2019

Respectfully submitted,

**GREATBANC TRUST COMPANY, MARY  
LEE SCHNEIDER, RICHARD JOUTRAS,  
RODNEY GOLDSTEIN, PETER MASON,  
ROBERT CRONIN, AND SEGERDAHL CORP.  
D/B/A SG360°**

/s/ Sarah J. Gasperini

Sarah J. Gasperini (local counsel)  
JACKSON LEWIS P.C.  
150 North Michigan Avenue, Suite 2500  
Chicago, Illinois 60601  
Tel: 312.787.4949  
Fax: 312.787.4995  
Email: Sarah.Gasperini@jacksonlewis.com

Charles F. Seemann III (PHV application forthcoming)  
Robert W. Rachal (PHV application forthcoming)  
JACKSON LEWIS P.C.  
650 Poydras Street, Suite 1900  
New Orleans, Louisiana 70130  
Tel: 504.208.1755  
Fax: 504. 208.1759  
Email: Charles.Seemann@jacksonlewis.com  
Robert.Rachal@jacksonlewis.com

And

**BRUCE RUSH**

/s/ James A. Bloom\*

James A. Bloom  
SCHNEIDER WALLACE COTTRELL KONECKY  
WOTKYNS LLP  
2000 Powell Street, Suite 1400  
Emeryville, California 94608  
Phone: (415) 421-7100  
Email: jbbloom@schneiderwallace.com

\* signature affixed by Defendants' counsel with consent

**CERTIFICATE OF SERVICE**

I, Sarah J. Gasperini, certify that on March 29, 2019, I caused the foregoing Joint Motion For Extension Of Time To Answer Or Otherwise Plead & Other Relief to be filed with the Court by electronic filing protocols, and that same will therefore be electronically served upon all attorneys of record registered with the Court's ECF/CM system.

/s/ Sarah J. Gasperini